

**WILLIE HENDERSON,
INDIVIDUALLY AND ON BEHALF OF
ALL OTHERS SIMILARLY SITUATED,**

V.

PIONEER CREDIT RECOVERY, INC.,

Defendants.

[illegible]

MOTION TO COMPEL

COMES NOW Plaintiff, through counsel, pursuant to Federal Rule of Civil Procedure 37, and respectfully moves that this Court compel Defendant Navient Portfolio Management (“NPM”) to respond to his First Discovery, propounded on May 24, 2019. As set forth in detail in the Memorandum of Law in Support of the Motion to Compel filed herewith and incorporated by reference herein, Defendant NPM has failed to timely respond to this discovery, even after receiving an extension from Plaintiff, and Plaintiff’s efforts to resolve the matter short of court intervention have been unsuccessful. For these reasons and those set forth in the accompanying Memorandum of Law, Plaintiff respectfully requests that the Court grant the motion to compel, and that this Court award the Plaintiff his attorney’s fees and reasonable costs incurred in bringing this motion.

Respectfully submitted,

WILLIE HENDERSON, individually and on behalf
of all others similarly situated

By: /s/John P. Fishwick, Jr.
Of Counsel

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Counsel for Plaintiff

CERTIFICATION

I hereby certify that counsel for Plaintiff has in good faith conferred or attempted to confer with counsel for NPM in an effort to obtain discovery responses without court action.

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CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

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